Carl R Gustafson, Bar No. 254881 Anne Y Shiau, Bar No. 273709 2 Lincoln Law, LLP 1525 Contra Costa Blvd 3 Pleasant Hill, CA 94523 Phone: (925) 500-4777 Facsimile: (800) 584-6826 5 help@lincolnlaw.com Attorney for Denise Earl б 7 IN THE UNITED STATES BANKRUPTCY COURT 8 NORTHERN DISTRICT OF CALIFORNIA 9 In Re: Case No: 15-42330 10 **DENISE EARL** 11 ) Chapter 13 12 ) Judge: Charles Novack Debtor. 13 ) REQUEST FOR ENTRY OF DEFAULT ) AND DECLARATION OF ATTORNEY 14 15 I, Carl R Gustafson, declare as follows: 16 1. I am one of the attorneys for the above-named Debtor. 17 2. On May 31st, 2017, a Motion to Modify Chapter 13 Plan and Notice and Opportunity 18 for Hearing was served on all creditors for the above named debtor, the United States Trustee, 19 and the Chapter 13 Trustee. No objections have been received, or the objections received, if any, 20 have been withdrawn, and the deadline to file objections has passed. 21 3. Wherefore, the Debtor, by and through counsel of record, hereby requests entry of an 22 order modifying her Chapter 13 Plan by default. 23 The foregoing declaration is made under penalty of perjury and executed <u>July 20, 2017</u>, at 24 Pleasant Hill, California. 25

/s/ Carl R Gustafson

Attorney & Counselor at Law

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